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VIA ECF

Hon. Jesse Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *City of Providence, et al. v. BATS Global Markets, Inc., et al.*, No. 14-cv-02811

Dear Judge Furman:

We write pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules of Practice to respectfully seek leave to file under seal certain materials in connection with Plaintiffs' Motion to Exclude the Report of Nasdaq's Expert James R. Burns (the "Confidential Materials"), and to redact from their public filings the Confidential Materials and references thereto. Plaintiffs' papers will be filed later today, July 26, 2021.


The Confidential Materials consist of documents that the Nasdaq and NYSE Defendants have marked "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order (ECF No. 402). Accordingly, Plaintiffs respectfully request leave to file the Confidential Materials under seal and to redact the corresponding references in Plaintiffs' Motion to Exclude the Report of Nasdaq's Expert James R. Burns.

Respectfully submitted,

By: /s/Thomas G. Hoffman, Jr.
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Application GRANTED temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 639.

SO ORDERED.



July 27, 2021